

LAVIN, CEDRONE, GRAVER, BOYD & DISIPIO  
Formed in the State of PA  
Regina Cohen  
Suite 500 190 North Independence Mall West 6th & Race Streets  
Philadelphia, PA 19106  
Tel: (215) 351-7551  
Fax: (215) 627-2551  
E-mail: RCohen@lavin-law.com  
Attorney for Movant

**ATTORNEY FOR MOVANT: ALLY CAPITAL**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY  
TRENTON DIVISION**

IN RE:	:	CHAPTER 11
COASTAL CONSTRUCTION GROUP,	:	
LLC	:	
	:	BANKRUPTCY NO. 24-15203(MBK)
Debtor	:	
	:	Hearing Date: November 7, 2024 at 10:00 am
	:	Judge: Honorable Michael B. Kaplan
	:	
	:	<b><u>NOTICE OF MOTION FOR RELIEF</u></b>
	:	<b><u>FROM AUTOMATIC STAY</u></b>
	:	<b><u>WITH WAIVER OF RULE 4001(a)(3)</u></b>
	:	

TO: Daniel E. Straffi, Esquire  
Straffi & Straffi, LLC  
670 Commons Way  
Toms River, NJ 08755

Coastal Construction Group, LLC  
235 Hickory Lane, Unit B  
Bayville, NJ 08721

U.S. Trustee  
US Dept of Justice  
Office of the US Trustee  
One Newark Center, Ste 2100  
Newark, NJ 07102

Margaret Mcgee  
DOJ-Ust  
One Newark Center  
108 Raymond Blvd.  
Ste 21<sup>st</sup> Floor  
Newark NJ 07102

PLEASE TAKE NOTICE that on **November 7, 2024 at 10:00 A.M.** or as soon as the matter may be heard, the undersigned, attorneys for Secured Creditor Ally Capital, will move before the Honorable Michael B. Kaplan of the United States Bankruptcy Court, 402 East State Street, Courtroom #8, Trenton, NJ 08608 for the entry of an Order for Relief from the Automatic

Stay with Waiver of Rule 4001(a)(3) with respect to Debtor's 2022 Dodge Commercial 5500 Ram 5500 Chassis & Regular Cab; VIN: 3C7WRNAJ8NG224417, and allowing Ally Capital to continue or institute a repossession action, by reason of the Debtor's failure to make regular monthly payments to Ally Capital.

LAVIN, CEDRONE, GRAVER, BOYD & DiSIPIO

DATED: October 16, 2024

/s/ REGINA COHEN

Regina Cohen, Esquire  
Attorney for Ally Capital